

LINE UP (Lifeline)

Proposed Procedures/Measures To Prevent Duplicate Phones From Being Issued To One Head-Of-Household

LINE UP is committed to preventing Lifeline fraud, waste and abuse. In addition to what LINE UP has already committed to in its Compliance Plan and prior ex-parte letters, LINE UP will commit to maintaining and implementing the following procedures and measures to reduce the possibility of signing up a customer for our Lifeline service who already has Lifeline service with another provider. These procedures would be in place pending the Commission's issuance of new rules in its pending Lifeline rulemaking proceeding, and would be modified to conform to those rules and orders, once issued.

LINE UP's primary business model will be such that we will have in-person sales contact with the majority of our Lifeline subscribers. Additionally, we will have call-center operations for sign-up over the phone. These methods of signing up customers will continue to be the prevalent means of subscribing eligible customers.

A. Engagement of Third-Party Service Bureau to Govern & Audit Monthly the USAC

Filing Process: Upon certification, LINE UP plans to engage a service bureau organization (SBO) such as CGM of LLC of Roswell, GA to compile, calculate, and file monthly USAC reimbursement request forms, in accordance with governing USAC filing process. This SBO will, to the extent that the data is made available, track and audit monthly USAC reimbursements, provide reporting on status of all activity, and where applicable, file disputes for discrepancies.

B. Improved In-Take Communications At Sign-Up To Highlight That Lifeline Is

Available Only On A One-Per-Household Basis: For customers that sign-up over the phone, *Exhibit A* shows the call center script that LINE UP would use to better prevent the customers from receiving duplicate Lifeline phones. For in-person sales, *Exhibit B* entails the sales training document/checklist LINE UP would provide to a customer service representative for use when a representative is signing up a potential Lifeline customer in person.

C. Improved Applications & Collateral Materials: While the majority of our business will come from in-person customer sales, we want to make sure that we reinforce the limitation of one Lifeline phone per head-of-household during the customer education/information cycle through the use of marketing collateral, literature and the internet. *Exhibit C* shows the brochure and *Exhibit D* application sign-up form with this information highlighted in red.

Application/Collateral:

- LINE UP would add the following to our application and collateral: **"Note: By law, the Lifeline program is only available for one phone per household."** We would place this language in a conspicuous place to ensure it is not overlooked such as right under the APPLICATION HEADER SECTION.
- LINE UP would also modify its disclosure statement to better ensure that customers read and review the statements to which they are attesting, including initialing each statement.

Disclosure Statement: By signing below, I certify, under penalty of perjury - (additionally, please initial each of the 4 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law.
Initials: _____
2. I understand that Lifeline is only available for one landline or wireless phone line per household. I am the head of household and will only receive Lifeline from LINE UP.
Initials: _____
3. Furthermore, I certify that I will only use this phone for my family's own use and will not resell it.
Initials: _____
4. I will notify LINE UP immediately if I no longer qualify for Lifeline, or if I have a question as to whether would still qualify.
Initials: _____

Website: On our website when a customer inputs his/her zip code to verify that LINE UP offers service in their area, we would use a flashing message (to draw attention to it) that says **"Note: By law, the Lifeline program is only available for one phone per household."**

Exhibit A

LINE UP Lifeline Call Center Script

Greeting: "Thank you for calling LINE UP. This is (Agent Name). May I please have your last name and the state you are calling from?"

1. "Are you calling for a new application or to check status?"
2. If status of application: "May I please have your address?"
3. If new application: Validate that they are the head of household and that they are not currently receiving a Lifeline subsidized phone with the following line of questioning:
 - a. "Do you currently have wireless or home phone service?" (if no, skip (b) - (e))
 - b. **If yes:** "Is that [wireless or home phone] service a subsidized service or do you pay full price?"
 - c. **If subsidized:** "By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?"
 - d. **If they are unsure:** "Who is your provider for that service?" (Safelink, Assurance, TSI/ Nexus Communications, other... only offer Lifeline so go to (e) if a more ambiguous provider, e.g., Verizon, Pacific Bell or Illinois Bell, try to question further to determine if they have Lifeline).
 - e. **If it is Lifeline:** "We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us."
 - f. If it is evident that they don't already have Lifeline service then click on add new customer and fill out appropriate information.

Exhibit B

Sales Training Materials

Refer to the state specific one page Sales Information sheet for state specific, program information.

If customer is interested in Lifeline service and is eligible under one of the programs or the income threshold listed in the "**Who is eligible to receive a LINE UP Lifeline phone and Free Service?**" section of the state specific information sheet, please complete the following procedures:

1. Ask the following questions:
 - a. "Do you currently have wireless or home phone service?" (if no, skip (b) - (f))
 - b. **If yes:** "Is that [wireless or home phone] service a subsidized or no-charge service, or do you pay full price?"
 - c. **If subsidized:** "By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?"
 - d. **If they are unsure:** "Who is your provider for that service?" (Safelink, Assurance, TSI / Nexus Communications, other... only offer Lifeline so go to (e) - if a more ambiguous provider, e.g., Verizon, Pacific Bell or Illinois Bell, try to dig further to determine if they have Lifeline).
 - e. **If it is Lifeline:** "We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us."

If it is evident that they don't already have Lifeline service, then proceed to 2.:

2. Click on "check customer's address" to perform an address check to insure there isn't already an LINE UP Lifeline phone registered to that address.
 - a. If there is an active LINE UP Lifeline phone registered at that address, then thank customer for their interest, explain the situation and say, "by law, the Lifeline program is only available for one phone per household".
 - b. If there isn't an active LINE UP Lifeline phone registered at that address, proceed to 3.
3. Assist customer in filling out the state specific application. Use the application guide/checklist to make sure it is filled out appropriately. Review the documentation for program/income proof closely against the guidelines to make sure the documentation meets the requirements.

Exhibit C

Program Brochure – see attachment #2

Exhibit D

Application Sign-up Form – see attachment #3